

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

TRAVIS CLOSE AND TINA CLOSE,
Individually and as Best Friend and
Guardian of G.C. and A.C., minor children

PLAINTIFFS,

VS

COOL RUNNINGS EXPRESS, INC.
AND BENJAMIN SCOTT BREWER

DEFENDANTS

*
*
*
*
*
*
*
*
*
*

DOCKET NO. 1:18-cv-110

JURY DEMAND

**PLAINTIFF'S FIFTH MOTION IN LIMINE – PLAINTIFF TRAVIS CLOSE'S
CRIMINAL RECORD**

Plaintiffs move that this Court exclude any evidence of arrests or convictions against Travis Close. Any criminal conviction does not meet the requirements of Federal Rules of Evidence 609. Mr. Close disclosed a DUI conviction from the 1990's and a Public intoxication from 2002 or 2003. Both crimes are misdemeanors and therefore do not meet the standard. This Court should enter an order excluding any evidence and prohibiting the questioning of these offenses.

Respectfully submitted,

TRUCK WRECK JUSTICE, PLLC

By: /s/ Danny R. Ellis

DANNY R. ELLIS, BPR #020747
1419 Market Street
Chattanooga, TN 37402
423-265-2020
danny@truckwreckjustice.com

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via CM/ECF upon the following:

John J. Griffin, Jr., Esq.
Michael A. Johnson, Esq.
Kay Griffin, PLLC
222 Second Avenue North, Suite 340-M
Nashville, TN 37201

Thomas M. Horne, Esq.
Luther-Anderson, PLLP
100 W. Martin Luther King Blvd.
One Union Square, Suite 700
Chattanooga, TN 37402

Rebecca C. Blair
Claire G. Sawyer
The Blair Law Firm
1608 Westgate Circle, Suite 100
Brentwood, TN 37027

This 26th day of April, 2021.

/s/Danny R. Ellis
DANNY R. ELLIS